

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Lehigh Cement Company
3084 West County Road 225 South
Logansport, IN 46947

ATTENTION:

Walter Smith
Plant Manger
Walter.Smith@lehighhanson.com

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Lehigh Cement Company (Lehigh or you) to submit certain information about the facility at 3084 West County Road 225 South, Logansport, IN. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information within 14 calendar days after you receive this request.

We are issuing this information request under Section 114 (a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114 (a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Lehigh owns and operates two hazardous waste burning cement kilns at the Logansport, Indiana facility. We are requesting this information to determine whether your emission sources are complying with the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Lehigh to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Valeria Apolinario at Apolinario.valeria@epa.gov or (312) 886-6876 to make arrangements to submit your response.

Lehigh must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Lehigh to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Valeria Apolinario at (312) 886-6876 or Apolinario.valeria@epa.gov.

Michael D. Harris
Director
Enforcement and Compliance Assurance Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors. The terms “startup” and “shutdown” shall have the meaning as defined in 40 C.F.R. § 63.2.

Appendix B

Information You Are Required to Submit to EPA

Lehigh Cement Company must submit the following information for each of its two hazardous waste burning cement kilns located at its Logansport, Indiana facility (Facility) pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) within 14 calendar days.

1. Provide the Facility's feedstream analysis plan as required by 40 C.F.R. § 63.1209(c)(2).
2. Identify how Lehigh monitors the following operating parameters, including but not limited to the monitoring and analytical equipment used, and the data recorded, calculated, and reported:
 - a. Semivolatile metal feed rate;
 - b. Semivolatile metal thermal feed rate;
 - c. Low volatile metal feed rate;
 - d. Low volatile metal thermal feed rate; and
 - e. Chlorine/chloride feed rate.
3. For each of the following operating parameters, provide the 12-hour rolling average operating parameter monitoring data, as required by 40 C.F.R. § 63.1209(c)(4), for the period of May 1, 2017, to the date of this request:
 - a. Semivolatile metal feed rate;
 - b. Semivolatile metal thermal feed rate;
 - c. Low volatile metal feed rate;
 - d. Low volatile metal thermal feed rate; and
 - e. Chlorine/chloride feed rate.
4. Provide the 1-minute pumpable hazardous waste feed rate for each hazardous waste burning cement kiln and identify periods of "startup" and "shutdown" for each hazardous waste burning cement kiln at the Facility from March 1, 2021, to the date of this request.